

N. Lopez
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OCT 30 2019



Air & Radiation Division

October 23, 2019

Certified Mail Receipt No:

US EPA Region III
Air Protection Division
1650 Arch Street (3AP00)
Philadelphia, PA 19103-2029

Re: 40 CFR Part 60 Subpart 0000a Annual Report

To Whom It May Concern:

Repsol Oil & Gas USA, LLC (ROGUSA) is submitting this **40 CFR 60 Subpart 0000a Annual Report** for Well Sites as per the requirements listed in 40 CFR 60.5420a(b). This report includes the period August 2, 2018 through August 1, 2019 and covers assets located in ROGUSA's Marcellus Business Unit (covering Pennsylvania and New York).

This annual report includes information for Gas Well Affected Facilities. This report does not include information for Continuous Bleed Pneumatic Controllers, or Storage Tanks, as ROGUSA does not currently have any of these types of Subpart 0000a Affected Facilities in the Marcellus Business Unit. ROGUSA did construct and startup a new compressor station, DCNR 010 Compressor Station, during the reporting period. DCNR 010 Compressor is comprised of reciprocating compressors and fugitive emission components that are subject to the requirements of 40 CFR 60 Subpart 0000a per § 60.5365a(c) and (j). No information regarding LDAR surveys of fugitive components and reciprocating rod packing replacement at DCNR 010 Compressor Station is included in this report because the facility started operation in early July 2019 and ROGUSA was not required to complete those tasks before the end of the reporting period on August 1, 2019.

It should be noted that the LDAR survey schedule was adjusted during this reporting period in an effort to maximize routing efficiency for surveyors completing LDAR surveys and quarterly mechanical integrity testing. The requested adjustments to the schedule were approved by the Pennsylvania Department of Environmental Protection (PADEP) on March 5, 2019. Documentation of communication and agreement between ROGUSA and the PADEP regarding this change is provided in Appendix A. The changes in the surveying schedule resulted in a few well pads being surveyed once while other well pads being surveyed outside the resurvey range of 4 to 6 months.

If you have any questions or need additional information, please contact Wesley Lyon, Project Engineer, at (207) 749-6676.

Sincerely,

Matthew Peterson

Assistant Corporate Secretary, Marcellus Business Unit
Repsol Oil & Gas USA, LLC

Cc: Pennsylvania Department of Environmental Protection
Bureau of Air Quality
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